

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CASE NUMBER 08-CV-1722**

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

Comes now the Plaintiff, GD Deal Holdings, LLC, by and through counsel, and, pursuant to FED. R. CIV. P. 65(b), requests the Court enter a Temporary Restraining Order against Surinder Multani; ABBE Properties, LLC; Sapphire Supply, LLC; JGG Investments, LLC; ABBE Capital and Leasing, LLC; ABBE Management Group, LLC; Safanpreet Multani; the Gurpriya Kaur Multani Irrevocable Trust; the Gurpap Singh Multani Irrevocable Trust; and the Japvi Singh Multani Irrevocable Trust. In support of this Motion, Plaintiff incorporates by reference its previously filed Motion for Preliminary Injunction (Docket # 59) herein. Plaintiff further submits that the facts as articulated in the Motion for Preliminary Injunction combined with the Exhibits attached thereto demonstrate that a Temporary Restraining Order against the above-referenced Defendants to stop further transfers of the judgment debtor Surinder Multani's assets is warranted.

WHEREFORE, the Plaintiff, GD Deal Holdings, LLC, respectfully requests that Surinder Multani; ABBE Properties, LLC; Sapphire Supply, LLC; JGG Investments, LLC; ABBE Capital and Leasing, LLC; ABBE Management Group, LLC; Safanpreet Multani; the Gurpriya Kaur Multani Irrevocable Trust; the Gurpap Singh Multani Irrevocable Trust; and the Japvi Singh Multani Irrevocable Trust be enjoined and restrained from, directly or indirectly, disposing or selling any assets without court approval until such time as a hearing on the Plaintiffs previously filed Motion for Preliminary Injunction (Docket # 59) may be conducted.

This day, August 5, 2008.

THOMAS M. FALKENBERG
WILLIAMS MONTGOMERY & JOHN LTD.
20 North Wacker Drive, Suite 2100
Chicago, Illinois 60606-3094
Telephone: (312) 443-3200

-and-

HARNED, BACHERT & DENTON, LLP
324 East Tenth Avenue
Post Office Box 1270
Bowling Green, Kentucky 42102-1270
Telephone: (270) 782-3938

/s/ Scott A. Bachert
SCOTT A. BACHERT

Verification:

I, Scott A. Bachert, attorney for GD Deal Holdings, LLC, state that the above and the facts as stated within the Plaintiff's previously filed Motion for Preliminary Injunction (Docket # 59) herein are true and correct to the best of my knowledge and belief.

This the 5th day of August, 2008


SCOTT A. BACHERT

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF WARREN)

Subscribed, sworn to and acknowledged before me by Scott A. Bachert, on this the 5th day of August, 2008.


NOTARY PUBLIC
My Commission Expires: 12-05-09

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Certification Pursuant to FED. R. CIV. P. 65(b):

The undersigned counsel for GD Deal Holdings, LLC states that the following efforts to give notice regarding the above Motion have been or will be undertaken this day, August 5, 2008.

1. Email of this Motion to Defendants' counsel, Hon. James O. Stola, at jstola@sbcglobal.com.
2. Fax of this Motion to Defendants' counsel, Hon. James O. Stola, at (773) 342-1185.
3. Mail of this Motion to Defendants' counsel, Hon. James O. Stola, 3701 West Fullerton Avenue, Chicago, Illinois 60647.

/s/ Scott A. Bachert
SCOTT A. BACHERT

CERTIFICATION:

This is to certify that a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court this day, August 5, 2008, by using the CM/ECF system, which will send a notice of electronic filing to the following:

Hon. Lucia Nale
Hon. Diane Renae Sabol
Hon. Nicole Joy Highland
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 630606-4637

Hon. Robert T. Kuehl
WELTMAN, WEINBERG & REIS CO., L.P.A.
180 N. LaSalle Street, Suite 2400
Chicago, Illinois 60601

Hon. James O. Stola
LAW OFFICE OF JAMES O. STOLA
3701 West Fullerton
Chicago, Illinois 60647

This is to certify that a true and correct copy of the foregoing document was this day, August 5, 2008, placed in the US Mail, postage prepaid, addressed to the following:

Hon. Leroy Simms
6061 Savoy Drive
Houston, Texas 77036

Babaji PS, LLC
c/o: Narendra Bhalla, Registered Agent
1718 Fry Road, Suite 415
Houston, Texas 77084

Capital Access & Investments, LLC
c/o: Narendra Bhalla, Registered Agent
1718 Fry Road, Suite 415
Houston, Texas 77084

G & S Portage, Inc.
c/o: Ajai Agnihotri, Registered Agent
1856 Samuelson Road
Portage, Indiana 46368

Hon. James O. Stola
LAW OFFICE OF JAMES O. STOLA
3701 West Fullerton
Chicago, Illinois 60647

/s/ Scott A. Bachert
SCOTT A. BACHERT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

**TEMPORARY RESTRAINING ORDER AS TO SURINDER MULTANI;
ABBE PROPERTIES, LLC; SAPPHIRE SUPPLY, LLC; JGG INVESTMENTS, LLC;
ABBE CAPITAL AND LEASING, LLC; ABBE MANAGEMENT GROUP, LLC;
SAFANPREET MULTANI; THE GURPRIYA KAUR MULTANI IRREVOCABLE
TRUST; THE GURPAP SINGH MULTANI IRREVOCABLE TRUST; AND THE
JAPVI SINGH MULTANI IRREVOCABLE TRUST**

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Surinder Multani; ABBE Properties, LLC; Sapphire Supply, LLC; JGG Investments, LLC; ABBE Capital and Leasing, LLC; ABBE Management Group, LLC; Safanpreet Multani; the Gurpriya Kaur Multani Irrevocable Trust; the Gurpap Singh Multani Irrevocable Trust; and the Japvi Singh Multani Irrevocable Trust (the "Defendants"), and each of them, be and are hereby enjoined and restrained from directly or indirectly, disposing of or selling any assets of Defendants without prior Court approval until such time as a hearing on the Plaintiffs previously filed Motion for Preliminary Injunction (Docket # 59) may be conducted.

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED, that the Defendants' agents, affiliates, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, and each of them, be and are hereby enjoined and restrained from, directly or indirectly, disposing of or

selling any assets of Defendants until such time as a hearing on the Plaintiffs previously filed Motion for Preliminary Injunction (Docket # 59) may be conducted.

DATED, this the _____ day of _____, 2008.

JUDGE, UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Tendered by:

THOMAS M. FALKENBERG
WILLIAMS MONTGOMERY & JOHN LTD.
20 North Wacker Drive, Suite 2100
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-and-

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/s/ Scott A. Bachert
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